

OFFICE OF THE HEALTH CARE ADVOCATE
Vermont Legal Aid

October 22, 2022

Round 1 HCA Questions to OneCare Vermont - 2022 ACO Budget Review

ACO Governance and Planning

1. As is documented on page 11 of OneCare Vermont's (OCV) FY 2022 Budget Narrative submitted to the Green Mountain Care Board (GMCB), University of Vermont Health Network has become the sole parent organization for OCV. Please describe specific cost savings and quality improvements that will result from this change.
2. Bailit Health presented a report, "Core Competencies of High-Performing Accountable Care Organizations (ACOs)," ¹ at the May 12, 2021 Green Mountain Care Board meeting. The report noted that a) hospital-led ACOs have generally not been successful at saving money and b) when hospital-led ACOs have achieved cost-savings, it is typically by reducing post-acute care costs.² In light of these findings, please respond to the following questions:
 - a. Most hospital-led ACOs cover a limited service area within a state. How is the ability to save money easier or harder for a hospital-led ACO that is state-wide such as OCV?
 - b. How does OCV save money without paying providers less, especially hospitals?
 - c. How does OCV ensure that pay isn't allocated by relative bargaining power or power within OCV so that all essential providers, including mental health and home and community-based services remain solvent?
 - d. Please specify, how will OCV's model increase healthcare affordability for Vermonters on commercial plans in the next five years?
3. Does OCV offer a means for participating providers and payers to provide confidential feedback, so they feel free to speak honestly? What steps have you taken to receive feedback on Vermonters' access and affordability needs?

Payment Reform

4. If utilization is much higher than predicted under unreconciled fixed prospective payments, how will health care entities fund high-cost, short-term providers (e.g., locum tenens) as these additional providers will not bring in added revenue?

¹ Bailit Health. (2021). *Core Competencies of High-Performing Accountable Care Organizations (ACOs)*. Green Mountain Care Board, https://gmcboard.vermont.gov/sites/gmcboard/files/documents/CoreCompetenciesofHighPerformingACOs_Bailit_BoardPres_20210512.pdf.

² Bailit Health, 2021, slide 8.

Evaluation of ACO Performance

5. The NORC VTAPM evaluation³ found that OCV struggled in the first two PYs to engage Critical Access Hospitals (CAHs). Aside from specific issues related to both the Medicare payment mechanism and cost-reporting challenges, please list what OCV learned from its engagement struggles with CAHs and the specific activities OCV is now taking to effectively engage CAHs.
6. As the GMCB and the NORC VTAPM evaluation¹ have noted, a lack of understanding of what OCV is and does has created provider engagement and public opinion difficulties. Please list concrete steps OCV has taken, is taking, or intends to take in response to such engagement and opinion difficulties.

Population Health

7. Given an increased awareness at the state and local level in Vermont to invest more in reducing racial disparities in access and quality of care, and given OCV's support of DULCE (p. 58 of the OCV Budget Narrative), why are these population health programs slated to be cut? Why does OCV argue that the only way to support these programs is through increased state and federal dollars (p. 60 of the OCV Budget Narrative)?
 - a. Similarly, please explain how important OCV believes care coordination is to its goal of decreasing costs and increasing value. How can you meet your goals when care coordination is an increasingly low priority in your budgeted expenditures?
8. OCV's FY 2022 Budget Narrative notes, on page 70, that anxiety and depression have been identified as two of the top five prevalent conditions for Medicaid and Commercial programs. How does OCV plan to address this finding through budgetary investments in FY 2022?
 - a. For example, on page 73 of the OCV Budget Narrative, OCV notes an "opportunity for improvement" is only 5% of pediatric practices meet stretch goals for depression screening. How does OCV plan to address this problem?

Please reach out to hcapolicystaff@vtlegalaid.org with any questions.

³ NORC at the University of Chicago. (2021). *First Evaluation Report: Evaluation of the Vermont All-Payer Accountable Care Organization Model*, <https://innovation.cms.gov/data-and-reports/2021/vtapm-1st-eval-full-report>.